

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: VICTOR MANUEL RIBAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:24-cv-00632-SPM
	)	
MEGAN BESLER,	)	
	)	
Defendant.	)	

**JOINT PROPOSED SCHEDULING PLAN**

In accordance with this Court's Order Setting Rule 16 Conference (Doc. 13), the Parties submit this Joint Proposed Scheduling Plan:

The Parties' joint proposed scheduling plan includes:

- a. Whether the Track Assignment is Appropriate. This case has been assigned to Track 2, which the Parties find suitable.
- b. Date for joinder of additional parties or amendment of pleadings;  
**September 20, 2024.**
- c. A discovery plan including:
  - i. a date of dates by which parties will disclose information and exchange documents pursuant to Federal Rule of Civil Procedure 26(a)(1):  
**August 9, 2024.**
  - ii. whether discovery should be conducted in phases or limited to certain issues:

**The Parties do not believe discovery needs to be conducted in phases or limited to certain issues.**

- iii. dates by which each party shall disclose its expert witnesses' identities and reports, and dates by which each party shall make its expert witnesses available for deposition, giving consideration as to whether serial or simultaneous disclosure is appropriate in the case:

**Plaintiff will identify his expert witnesses and produce accompanying expert reports, by November 1, 2024, and make his experts available for deposition by December 1, 2024.**

**Defendant will identify her expert witnesses and produce accompanying expert reports by January 1, 2025, and make her experts available for deposition by February 1, 2025.**

- iv. whether the presumptive limit of ten (10) depositions per side as set forth in Federal Rule of Civil Procedure 30(a)(2)(A), and twenty-five (25) interrogatories per party as set forth in Federal Rule of Civil Procedure 33(a), should apply in this case, and, if not, the reasons for the variance from the Rules:

**The Parties believe the presumptive limit of 10 depositions and presumptive limit of 25 interrogatories is sufficient.**

- v. whether any physical or mental examination of parties will be requested pursuant to federal rule of civil procedure 35 and if so, by what date that request will be made and the date the examination will be completed:

**The Parties anticipate a mental examination of Plaintiff might be necessary, which would be completed by November 15, 2024.**

- vi. a date by which all discovery will be completed. See applicable track range Section 3:

**All discovery will be completed by February 16, 2025.**

- vii. any agreed-upon provisions for disclosure or discovery of electronically stored information:

**The Parties do not anticipate needing a separate ESI protocol.**

- viii. any other matters pertinent to the completion of discovery in this case:

**None.**

- d. the parties' position concerning the referral of the action to mediation or early neutral evaluation, and when such a referral would be most productive.

**The Parties believe an ADR referral would be productive on or before October 1, 2024.**

- e. Dates for filing any motions to dismiss, motion for summary judgment, or motions for judgment on the pleadings:

**All dispositive motions shall be filed by March 1, 2025.**

- f. The earliest date by which this case could reasonably be expected to be ready for trial;

**The Parties believe the case should be ready for trial by August 1, 2025.**

- g. An estimate of the length of time expected to try the case to verdict; and

**The Parties believe the trial of this case will take one week.**

- h. Any other matters counsel deems appropriate for inclusion in the joint proposed scheduling plan.

**None.**

/s/ Ryan Keane (by consent)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was transmitted to all parties of record on this 2<sup>ND</sup> day of July 2024 by operation of this Court's electronic filing system.

/s/ Marshall R. Hoekel